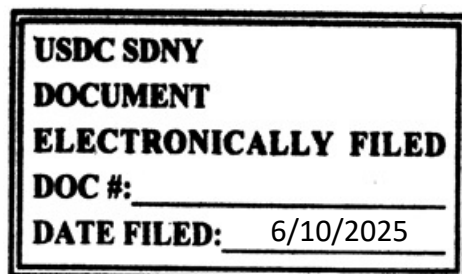




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June 9, 2025

VIA ECF

The Honorable Stewart D. Aaron
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Escamilla et al. v. 48 West 21st Street Corp. et al.*
Case No. 1:25-cv-00784-VSB-SDA

Dear Judge Aaron:

We represent defendants 48 West 21st Street Corp. d/b/a Taj Lounge Restaurant, David Casey, Mark Philip Quilter, and Matthew Knott in this wage and hour case brought by plaintiffs Francisco Delgado Escamilla, Carlos Contreras Cayetano, Fernando Perez Garcia, Eliezer Perez Molina, and Jamie Garcia Hernandez, individually and on behalf of others similarly situated. Pursuant to Section I.C. of Your Honor's Individual Practices and with the consent of Plaintiffs, we respectfully request a thirty-day extension of time, until July 9, 2025, for the Parties to file their report of their Rule 26(f) meeting and proposed Case Management Plan.

This extension of time is sought because the Parties are working to resolve this matter through mediation. A first mediation session, with the mediator appointed by the Court, is presently scheduled for June 20, 2025. In addition, Defendants have not yet responded to Plaintiffs' first amended complaint. The present deadline for Defendants' response is June 30, 2025.

Accordingly, the Parties agree that it would be prudent, in the immediate future, to concentrate their time and resources upon negotiating a resolution rather than committing to and engaging in initial discovery. Moreover, should the Parties reach a resolution, the Rule 26(f) report and Case Management Plan would be unnecessary. This is our first request for such an extension of time, which, if granted, would not affect any other deadlines. We appreciate your consideration of this request.

Respectfully submitted,

/s/ David J. Grech

David J. Grech
Andrew J. Varvaro

cc: All Counsel of Record (via ECF)

The parties' consent letter motion (ECF No. 32) is GRANTED. The parties shall file the Proposed Case Management Plan no later than July 9, 2025.

SO ORDERED.

Dated: June 10, 2025

A handwritten signature in blue ink, appearing to read "Stuart L. Aaron". The signature is written in a cursive, flowing style.